

EXHIBIT 3

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

AHMED ELZEIN,

Plaintiff,

Case No. 22-cv-12352

vs

ASCENSION GENESYS HOSPITAL,

Defendant.

-----/

DEPONENT: MARK VOGEL, PH.D.

DATE: Tuesday, November 14, 2023

TIME: 1:31 p.m.

LOCATION: Zoom Video Conference

REPORTER: Heidi A. Cook, CSR-4827

Job No.: 26726

AHMED ELZEIN vs ASCENSION GENESYS HOSPITAL
VOGEL, MARK 11/14/2023

Job 26726
10..13

<p style="text-align: right;">Page 10</p> <p>1 and I completed a two-year fellowship, and that 2 finished in 1989. And then my official 3 employment began in 1989. 4 Q Other than Ascension Genesys Hospital and your 5 private practice, have you practiced psychology 6 for any other entities? 7 A And just to be clear, back in 1989 it was not 8 Ascension Genesys, it was St. Joes Hospital; 9 that eventually became Ascension Genesys. It 10 was Genesys before it was Ascension, too, so -- 11 Q So let's -- let me rephrase the question and 12 make sure to clarify that. 13 A Sure. 14 Q So other than for Ascension Genesys, or any of 15 its predecessors, have you practiced psychology 16 for anyone else other than the Ascension 17 Genesys and its predecessors, or in your 18 private practice? 19 A No, those are the only two entities of which 20 I've been employed at. 21 Q Do you have any subspecialties within 22 psychology? 23 A Yes. 24 Q What are those? 25 A I'm a health psychologist.</p>	<p style="text-align: right;">Page 12</p> <p>1 services in the family medicine residency, and 2 in the hospital. 3 Q And would that be providing it to Ascension 4 Genesys interns and residents? 5 A No. So in terms of my clinical services, it 6 would be to hospitalized patients, outpatients 7 at the Family Medicine Center. So those were 8 the two locations where I would see clinical, 9 do clinical practice. 10 Q Okay. Your current practice, are you full-time 11 or part-time? 12 A Part-time. 13 Q Was your separation from Ascension Genesys 14 Hospital voluntary on your part? 15 A Yes. 16 Q Have you reviewed any documents to prepare for 17 your deposition today? 18 A I'm sorry. I didn't hear your question. 19 Q Did you review any documents to prepare for 20 your deposition today? 21 A No. 22 MS. LEBEAU: Let me just jump 23 in. He did take a look at the Subpoena, 24 obviously. 25 MR. STEMPIEN: Well, okay. Fair</p>
<p style="text-align: right;">Page 11</p> <p>1 Q Can you tell me what that means? 2 A So health psychology is the discipline that is 3 focused on understanding the, kind of how 4 psychology and medicine interact together. And 5 so it is the discipline that is focused on how 6 illness has psychological components, and how 7 psychological components can affect someone's 8 health status. 9 Q In the year 2020 were you in a particular 10 department at Ascension Genesys Hospital? 11 A Correct. I was in the Department of Medical 12 Education. 13 Q Were you in the Department of Medical Education 14 until your retirement in September of '21? 15 A Yes. 16 Q When did you start at the DME department? 17 A That was the department I was in the entire 18 time of my employment. 19 Q And what were the general description of your 20 job duties in that department? 21 A My job title was as Program Director of the 22 Health Psychology Post Doctoral Fellowship, and 23 my job duties included managing that post 24 doctoral fellowship, supervising our post 25 doctoral fellows, and providing clinical</p>	<p style="text-align: right;">Page 13</p> <p>1 enough. 2 Q (By Mr. Stempien) Any documents related to 3 Dr. Ahmed Elzein to prepare for your deposition 4 today? 5 A No. 6 Q Have you spoken to anybody other than an 7 attorney to prepare for your deposition today? 8 A No. 9 Q Do you know who Dr. Ahmed Elzein is? 10 A I have met him once. 11 Q Okay. Do you remember him? 12 A I remember the one meeting with him, yes. 13 Q What was the context of that meeting with him? 14 A I was asked by the Program Director of the 15 Internal Medicine Residency Program, 16 Dr. Barbara Pawlaczyk, to come down to our, 17 literally, the food court in the hospital. And 18 she was concerned about a resident, and asked 19 me to come down and see if I could convince him 20 to go to the Emergency Room to get further 21 evaluated. 22 Q Okay. Prior to that contact, did you know who 23 Dr. Elzein was? 24 A I had never met him personally. I would say 25 prior to that contact I was aware, as in</p>